

Exhibit D

Page 1

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SUPREME COURT

ALL COUNTIES WITHIN THE STATE OF NEW YORK



IN RE: NEW YORK CITY ASBESTOS LITIGATION

DEPOSITION UNDER ORAL  
EXAMINATION OF  
CHRISTIAN HOLINKA  
(VOLUME II)

This Document Applies To:

CHRISTIAN HOLINKA

INDEX NO.: 114120-06

PRIORITY ONE COURT REPORTING SERVICES, INC.

899 Manor Road

Staten Island, New York 10314

(718) 983-1234

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1 58  
 2 Transcript of the deposition of the Plaintiff,  
 3 called for Oral Examination in the above-captioned  
 4 matter, said deposition being taken pursuant to  
 5 Federal Rules of Civil Procedure by and before  
 6 CHERYL F. BAREN, a Notary Public and Shorthand  
 7 Reporter, at the Offices of Weitz & Luxenberg, 120  
 8 Wall Street, New York, New York, on Thursday, February  
 9 22, 2007, commencing at approximately 10:30 in the  
 10 forenoon.

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<p style="text-align: right;">Page 6</p> <p style="text-align: center;">62</p> <p>1 IT IS HEREBY STIPULATED AND AGREED by and between</p> <p>2 the attorneys for the respective parties hereto that</p> <p>3 filing, sealing and certification of the within</p> <p>4 Examination Before Trial be waived; that all</p> <p>5 objections, except as to form, are reserved to the</p> <p>6 time of trial.</p> <p>7 IT IS FURTHER STIPULATED AND AGREED that the</p> <p>8 transcript may be signed before any Notary Public with</p> <p>9 the same force and effect as if signed before a Clerk</p> <p>10 or Judge of the Court.</p> <p>11 IT IS FURTHER STIPULATED AND AGREED that the</p> <p>12 within examination may be utilized for all purposes as</p> <p>13 provided by the CPLR.</p> <p>14 IT IS FURTHER STIPULATED AND AGREED that all</p> <p>15 rights provided to all parties by the CPLR shall not</p> <p>16 be deemed waived and the appropriate sections of the</p> <p>17 CPLR shall be controlling with respect thereto.</p> <p>18 IT IS FURTHER STIPULATED AND AGREED by and</p> <p>19 between the attorneys for the respective parties</p> <p>20 hereto that a copy of the Examination shall be</p> <p>21 furnished, without charge, to the attorney</p> <p>22 representing the witness testifying herein.</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 Christian Holinka 64</p> <p>2 If you do not understand any of my</p> <p>3 questions, will you be sure to tell me?</p> <p>4 A Yes.</p> <p>5 Q All of your responses do also have to be</p> <p>6 verbal because the Court Reporter over here cannot</p> <p>7 take down physical gestures or things like that.</p> <p>8 Have you had an opportunity to read the</p> <p>9 transcript or typed up version of the testimony that</p> <p>10 you gave a couple of weeks ago?</p> <p>11 A Yes, I have.</p> <p>12 Q And in review of that, were there any</p> <p>13 significant changes or alterations that you feel were</p> <p>14 not properly reflected in the testimony you gave?</p> <p>15 A No significant changes.</p> <p>16 Q As was the case a couple of weeks ago, if</p> <p>17 at the moment I ask you a question you do not know the</p> <p>18 answer to it but then at some point later on it comes</p> <p>19 to you, that is fine, just let us know and we will</p> <p>20 deal with it at that time. We want to make sure there</p> <p>21 is an accurate record and give you every option to</p> <p>22 make an accurate record.</p> <p>23 Did you take any medications before coming</p> <p>24 here today?</p> <p>25 A No.</p>
<p style="text-align: right;">Page 7</p> <p>1 Christian Holinka 63</p> <p>2 CHRISTIAN HOLINKA, the</p> <p>3 Plaintiff herein, after previously having been</p> <p>4 duly sworn by a Notary Public of the State of New</p> <p>5 York, was examined and testified as follows:</p> <p>6 CONTINUED DIRECT EXAMINATION</p> <p>7 BY MR. SCHAFER:</p> <p>8 Q Good morning, sir.</p> <p>9 A Good morning.</p> <p>10 Q My name is David Schaffer, we met off the</p> <p>11 record just a moment ago. I am with the law firm of</p> <p>12 Malaby, Carlisle and Bradley, and I am here to</p> <p>13 continue the questioning that was started by my</p> <p>14 colleague a couple of weeks ago, Cori Leavitt, who</p> <p>15 could not be here.</p> <p>16 I have read your transcript from the</p> <p>17 testimony you gave a couple of weeks ago and I am</p> <p>18 going to try not to repeat things. To the extent that</p> <p>19 I do, please bear with me and we will get through this</p> <p>20 as quickly as we can.</p> <p>21 The same ground rules that Ms. Leavitt went</p> <p>22 over with you apply. Please, wait until I finish my</p> <p>23 question completely before you start your answer. I</p> <p>24 will afford you the same courtesy and wait for you to</p> <p>25 finish your answer before I start my next question.</p>	<p style="text-align: right;">Page 9</p> <p>1 Christian Holinka 65</p> <p>2 Q When did you review the transcript of the</p> <p>3 last session?</p> <p>4 A Today.</p> <p>5 Q How long did you go over it?</p> <p>6 A About ten minutes.</p> <p>7 Q Besides possibly representatives of your</p> <p>8 law firm, did you talk with anyone else about the</p> <p>9 testimony you gave and plan to give today?</p> <p>10 A No.</p> <p>11 MR. SCHAFER: Off the record.</p> <p>12 (Discussion held off the record)</p> <p>13 Q It is my understanding, sir, that you came</p> <p>14 to the United States in around 1956 after finishing</p> <p>15 the boarding school in Oldenburg; is that right?</p> <p>16 A That's correct.</p> <p>17 Q Now, when you came to the United States,</p> <p>18 what was the first employment that you had?</p> <p>19 A I worked briefly as an elevator operator</p> <p>20 for about five weeks.</p> <p>21 Q And where was that job?</p> <p>22 A That was at the Commodore Hotel in New York</p> <p>23 City.</p> <p>24 Q And was that in 1956?</p> <p>25 A Yes.</p>

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1 Christian Holinka 66  
 2 Q Do you know approximately when? Even a  
 3 season would be fine.  
 4 A November of '56.  
 5 Q And did that employment carry through into  
 6 1957?  
 7 A No.  
 8 Q Do you believe that you were exposed to  
 9 asbestos in any way while you were working as an  
 10 elevator operator?  
 11 A I do not know.  
 12 Q What were your duties as an elevator  
 13 operator?  
 14 A Operate the elevator.  
 15 Q Bringing individuals up and down the floors  
 16 of the hotel?  
 17 A Yes.  
 18 Q Did you run only the passenger elevators as  
 19 opposed to cargo elevators?  
 20 A Only passenger.  
 21 Q What was the next job that you held after  
 22 being an elevator operator?  
 23 A United States Army.  
 24 Q And when did you join the Army?  
 25 A In November 1956.

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1 Christian Holinka 67  
 2 MR. DARCHE: Off the record.  
 3 (Discussion held off the record)  
 4 Q And you left the Army at what point, sir?  
 5 A In 1959, July or August.  
 6 Q And at that point, sir, did you hold any  
 7 other jobs before going on to UC Berkeley?  
 8 A Yes.  
 9 Q Can you tell me what was the next  
 10 employment you had after you were discharged?  
 11 A Booth Memorial Hospital in New York, in  
 12 Queens.  
 13 Q When did you start at Booth Memorial?  
 14 A In late 1959, I think September.  
 15 Q And if Ms. Leavitt did not give you this  
 16 instruction last time, I will give it to you now: To  
 17 the extent that I am asking you about things that  
 18 happened to some degree decades even in the past, if  
 19 there is a way that you can give me your best estimate  
 20 if you do not know precisely, that is fine,  
 21 understood? If you are just flat-out guessing, nobody  
 22 here wants you to do that. Tell me you do not know  
 23 and we will move forward. But we are entitled to a  
 24 best estimate and sometimes if you can tie things like  
 25 dates or events into either events in your personal

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1 Christian Holinka 68  
 2 life or events going on in the world, that helps us  
 3 work with a timeline a little bit.  
 4 A Understood.  
 5 Q How long did you work at Booth?  
 6 A Three and a half months.  
 7 Q What was your position there when you  
 8 started?  
 9 A A laboratory technician.  
 10 Q And did you hold that same position  
 11 throughout the entire time you were there?  
 12 A Yes.  
 13 Q What were your duties as a laboratory  
 14 technician?  
 15 A Clinical chemistry, analysis of human  
 16 material serum, urine to an extent.  
 17 Q Were you as a technician responsible for  
 18 screening for any particular types of illnesses or  
 19 problems with respect to the human materials?  
 20 A No.  
 21 Q Do you know if your screening involved the  
 22 screening of any contagions of any type?  
 23 A No.  
 24 Q You do not know?  
 25 A No, I didn't screen for any contagious

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1 Christian Holinka 69  
 2 material.  
 3 Q Who was your supervisor when you were  
 4 working at Booth?  
 5 A Dr. Blaustein.  
 6 Q Do you remember Dr. Blaustein's first name?  
 7 A Ansel.  
 8 Q Is Dr. Blaustein still alive, if you know?  
 9 A No. No, he's not still alive.  
 10 Q I try not to ask questions in an ambiguous  
 11 fashion but please, clarify as you are doing.  
 12 Besides yourself were there other  
 13 laboratory technicians working alongside you with  
 14 similar duties?  
 15 A The section head of the laboratory.  
 16 Q And who was that?  
 17 A Her name is Olga, first name, last name  
 18 Bzrorad. I'm going to try to spell it.  
 19 Q Okay, thank you.  
 20 A B-Z-R-O-R-A-D. I'm not sure of the  
 21 spelling.  
 22 Q And is Olga still alive?  
 23 A Yes -- I don't know but -- I don't know.  
 24 Q When was the last time you had any contact  
 25 with her?

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<p>1 Christian Holinka 70</p> <p>2 A In 1960.</p> <p>3 Q So, over 40 years ago?</p> <p>4 A Uh-huh.</p> <p>5 Q That is a yes, right?</p> <p>6 A Yes.</p> <p>7 Q So, was the chain of command you would</p> <p>8 report to Olga and then Dr. Blaustein supervised</p> <p>9 everybody?</p> <p>10 A Yes, that's correct.</p> <p>11 Q Did anybody else work with you at Booth</p> <p>12 during that three and a half months?</p> <p>13 A Yes.</p> <p>14 Q Who else did?</p> <p>15 A I don't remember their names.</p> <p>16 Q Did they have duties similar to yours as a</p> <p>17 lab technician?</p> <p>18 A Yes.</p> <p>19 Q What were your shift or hours typically?</p> <p>20 A Nine to five, day shift.</p> <p>21 Q Monday to Friday?</p> <p>22 A Yes.</p> <p>23 Q How did you get that job?</p> <p>24 A I applied for it at the hospital. Being</p> <p>25 trained in the Army as a medical laboratory</p>	<p>1 Christian Holinka 72</p> <p>2 Q And replace it?</p> <p>3 A And replace it, yes.</p> <p>4 Q Can you give us any sort of a</p> <p>5 quantification as to how long a Bunsen burner pad</p> <p>6 would last?</p> <p>7 A It depends on the frequency of its use.</p> <p>8 And usually a Bunsen burner is the principal heat</p> <p>9 source of all the laboratories I've worked in.</p> <p>10 Usually it's used pretty frequently, meaning certainly</p> <p>11 daily, very frequently. I would guess, and that's not</p> <p>12 a precise answer, that certainly every few days you</p> <p>13 would replace it. But again, it depends upon the</p> <p>14 frequency of use.</p> <p>15 Q Understood. Would it also depend on the</p> <p>16 temperature of the flame that was being used in any</p> <p>17 application?</p> <p>18 A I would say the flame temperature is pretty</p> <p>19 constant. It's gas that comes right out of a burner.</p> <p>20 Q Do you know what the temperature of the gas</p> <p>21 typically was out of those Bunsen burners?</p> <p>22 A No. Interesting question.</p> <p>23 Q Do you know what the fuel source of the gas</p> <p>24 was?</p> <p>25 A I would imagine the same fuel source that</p>
Page 15	Page 17
<p>1 Christian Holinka 71</p> <p>2 technologist I was qualified.</p> <p>3 Q During the time that you were at Booth, do</p> <p>4 you believe that you were exposed to asbestos in any</p> <p>5 way?</p> <p>6 A Yes.</p> <p>7 Q Do you believe that you personally handled</p> <p>8 any materials that contained asbestos while at Booth?</p> <p>9 A Yes.</p> <p>10 Q Can you tell me all the different types of</p> <p>11 materials that you handled that you believe contained</p> <p>12 asbestos when you worked there?</p> <p>13 A Bunsen burner pads that had a center round</p> <p>14 asbestos component to diffuse the heat, distribute the</p> <p>15 heat uniformly. And heat mittens that were used to</p> <p>16 handle hot glass work from drying ovens or otherwise</p> <p>17 hot.</p> <p>18 Q How do you believe that you were exposed to</p> <p>19 asbestos from the Bunsen burner pads at Booth?</p> <p>20 A The asbestos gradually becomes brittle due</p> <p>21 to the high heat and the heat moves the air really and</p> <p>22 one would expect that dust particles would be</p> <p>23 generated. Also once the Bunsen burner pad was no</p> <p>24 longer usable because the center piece became brittle,</p> <p>25 you dispose of it.</p>	<p>1 Christian Holinka 73</p> <p>2 was used in households for gas flames.</p> <p>3 MR. DARCHE: Don't guess.</p> <p>4 A I don't know.</p> <p>5 Q And I am just asking you what you know.</p> <p>6 How many Bunsen burners were in the lab</p> <p>7 when you worked there?</p> <p>8 A Half a dozen.</p> <p>9 Q If there was an occasion as you described</p> <p>10 that the pad had to be replaced, where would you get</p> <p>11 the replacement pad from?</p> <p>12 A It was standard equipment at a laboratory.</p> <p>13 There was a supply cabinet and I took it from there.</p> <p>14 Q Do you recall what the supply cabinet at</p> <p>15 Booth looked like?</p> <p>16 A No.</p> <p>17 Q Do you recall what color the pads were at</p> <p>18 Booth? Let's start with the new ones first.</p> <p>19 A Well, the metal grid was grayish metal,</p> <p>20 fine grayish metal, and the center round pad was tan,</p> <p>21 whitish-tan, whitish-gray.</p> <p>22 Q And the metal portion, was that like a</p> <p>23 mesh?</p> <p>24 A Yes.</p> <p>25 Q How far across in diameter would the pad</p>

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1 Christian Holinka 74  
 2 section of that be?  
 3 A About that wide. (Indicating)  
 4 Q Which would be what, sir? Since the Court  
 5 Reporter cannot take down that gesture.  
 6 A About 3 1/2 inches.  
 7 Q And did the material protrude from the  
 8 plane of the mesh both above and below it? Do you  
 9 know what I mean?  
 10 A Above, to my recollection mainly above.  
 11 Q Any idea how thick the material was?  
 12 A A few millimeters.  
 13 Q Do you know the brand, trade or  
 14 manufacturer's name of any of the Bunsen burner pads  
 15 that you used at Booth Memorial?  
 16 A There were standard suppliers to that lab  
 17 and later during my research career such as Fisher  
 18 Scientific, American Scientific, Senco, Van Waters and  
 19 Rogers. Those were the major suppliers.  
 20 MS. LYONS: Could you read that back,  
 21 please.  
 22 (Whereupon, at this time, the requested  
 23 portion was read back by the reporter)  
 24 Q And with respect, sir, and just limiting  
 25 our question right now to the time you were at Booth,

Page 19

1 Christian Holinka 75  
 2 do you know what company supplied the pads that were  
 3 used at Booth?  
 4 A No, I do not.  
 5 Q The names that you gave me are names that  
 6 you associate with supplier's pads throughout your  
 7 career; is that right?  
 8 A Yes. And if I may say so, Booth was a job.  
 9 I walked in there in the morning, did my work unlike  
 10 later my scientific career, did my work and was not  
 11 really further involved in any of the details of the  
 12 laboratory.  
 13 Q I understand. Did you have any  
 14 responsibility for ordering any of the supplies that  
 15 were used at that lab?  
 16 A No.  
 17 Q Did you ever see any paperwork that  
 18 accompanied any of the supplies that were ordered at  
 19 the lab and present in the supply area?  
 20 A No, I didn't.  
 21 Q You indicated that you also used heat  
 22 mittens at Booth?  
 23 A Yes.  
 24 Q With what frequency would you use the heat  
 25 mittens?

Page 20

1 Christian Holinka 76  
 2 A Daily.  
 3 Q And I believe you said that you would use  
 4 them to handle hot glassware; is that right?  
 5 A Yes.  
 6 Q Did you use them for any other application?  
 7 A No.  
 8 Q Did the mittens that you used at Booth --  
 9 MR. SCHAFFER: Withdrawn.  
 10 Q When you first started using the mittens at  
 11 Booth, what did they look like? Let's start with  
 12 color.  
 13 A Tanish, light gray. And they had a thumb  
 14 compartment and a compartment for the whole hand.  
 15 Q So, they did not have individual fingers?  
 16 A No.  
 17 Q Did they cover just the hand or did they  
 18 run a length up your arm to some degree?  
 19 A Including the wrist. (Indicating)  
 20 Q Did the gloves appear to be made of one  
 21 continuous piece or did they have a sleeve or anything  
 22 around the end of them by the wrist? Do you  
 23 understand my question?  
 24 A Yes.  
 25 Q Okay.

Page 21

1 Christian Holinka 77  
 2 A They did not have a sleeve to the best of  
 3 my recollection.  
 4 Q Were there any words or logos or anything  
 5 of any nature printed on the gloves themselves that  
 6 you used at Booth?  
 7 A Not to my recollection, no.  
 8 Q Did they have a different material on their  
 9 inside as opposed to their outside?  
 10 A By inside you mean inside the glove or on  
 11 the one side of the glove versus the other?  
 12 Q Well, let me start with the portion of the  
 13 glove that you would slide your hand into that was  
 14 immediately contacting your skin, was that surface  
 15 similar to the surface that you would see on the  
 16 outside of the glove?  
 17 A To the best of my recollection, yes.  
 18 Q And was there a difference in the exterior  
 19 surface of the glove between the portion that covered  
 20 your palm as opposed to the portion that covered the  
 21 back of your hand?  
 22 A To the best of my recollection, no.  
 23 Q Do you have any information as to the  
 24 brand, trade, manufacturer's name or supplier of the  
 25 gloves that were used at Booth, specifically at Booth?



Page 22

1 Christian Holinka 78  
 2 A They were standard suppliers that were used  
 3 by the laboratory.  
 4 Q When you say standard suppliers, sir, let  
 5 me ask you as with the Bunsen burner pads, did you  
 6 have any responsibility to order the gloves that were  
 7 used at the lab?  
 8 A No, I didn't.  
 9 Q Do you know who did have that  
 10 responsibility?  
 11 A No.  
 12 Q And I can appreciate the fact that that was  
 13 just a job for you, sir, but specifically with respect  
 14 to Booth, do you know who manufactured or supplied any  
 15 of the gloves that you used there?  
 16 A There were major suppliers for laboratory  
 17 equipment and those suppliers supplied a broad  
 18 spectrum of what was needed at the laboratory.  
 19 Q Understood. But with respect to Booth, do  
 20 you know who specifically supplied the gloves you used  
 21 there?  
 22 A No, I do not.  
 23 Q Besides the gloves and the Bunsen burner  
 24 pads, do you believe you personally handled any other  
 25 types of materials at Booth that you think caused you

Page 23

1 Christian Holinka 79  
 2 to be exposed to asbestos?  
 3 A I do not know.  
 4 Q How long would a pair of gloves typically  
 5 last when you were using them?  
 6 A Again, it depends on the use of course. I  
 7 cannot estimate.  
 8 Q And as you sit here today, besides the pads  
 9 and the mittens -- I'm sorry, we have been calling  
 10 them gloves interchangeably.  
 11 A Gloves, mittens, yes.  
 12 Q Besides the pads and the mittens, are you  
 13 aware as you sit here today of any other way that you  
 14 may have been exposed to asbestos when you worked at  
 15 the lab at Booth?  
 16 A No, I am not aware of any other way.  
 17 Q Why did you leave the job at Booth?  
 18 A Because I was accepted by the University of  
 19 California at Berkeley as an undergraduate student.  
 20 Q And you went out to Berkeley and began your  
 21 study; is that right?  
 22 A Yes.  
 23 Q As an undergraduate student did you have  
 24 any major or particular field of study that you  
 25 pursued?

Page 24

1 Christian Holinka 80  
 2 A Physiology and French literature.  
 3 Q And did you get your undergraduate degree  
 4 in four years?  
 5 A In two and a half years.  
 6 Q Were you in a combined undergraduate and  
 7 Master's program?  
 8 A No.  
 9 Q Did you take classes 12 months of the year  
 10 to accelerate your graduation?  
 11 A That's correct.  
 12 Q During the time that you were taking  
 13 undergraduate classes at UC Berkeley, do you believe  
 14 that you were exposed to asbestos in any way?  
 15 A Yes, I was.  
 16 Q And again, limiting it to the two and a  
 17 half years that you were there as an undergraduate,  
 18 how do you believe that you were exposed to asbestos?  
 19 A I worked part-time at a research laboratory  
 20 with standard equipment including, of course, Bunsen  
 21 burners, heat mittens.  
 22 Q Besides the work part-time at the research  
 23 laboratory for those two and a half years, do you  
 24 believe that you were exposed to asbestos in any other  
 25 way while you were an undergraduate?

Page 25

1 Christian Holinka 81  
 2 A Well, as part of your laboratory courses in  
 3 academia, you do experiments requiring Bunsen burners.  
 4 Q Let's talk about then the part-time work  
 5 you did first. What was the name of the research  
 6 laboratory that you did the part-time work at?  
 7 A Department of physiology.  
 8 Q So, this was a lab that was affiliated with  
 9 the school?  
 10 A Yes.  
 11 Q When did you first start working there  
 12 part-time as an undergraduate?  
 13 A In spring 1960.  
 14 Q Did you work there continuously part-time?  
 15 A Yes.  
 16 Q For how long did you work there  
 17 continuously part-time?  
 18 A Until mid-1962.  
 19 Q And it was at that point that you had  
 20 completed your undergraduate work?  
 21 A Yes.  
 22 Q Where was the department of physiology lab  
 23 located?  
 24 A At the Life Sciences Building on the main  
 25 campus, University of Cal Berkeley.



Page 26

1 Christian Holinka 82  
 2 Q Do you know if that building is still  
 3 there?  
 4 A Yes.  
 5 Q It is?  
 6 A Yes, it is.  
 7 Q And when was the last time that you had an  
 8 opportunity to be in that building?  
 9 A About a year and a half ago, two years ago.  
 10 Q Did you have the opportunity to go to the  
 11 space where you worked out of in your last visit?  
 12 A I had the opportunity but I did not go into  
 13 the laboratories. The building has been completely  
 14 changed and renovated.  
 15 Q So, you understand that the physical layout  
 16 of the area where you were working part-time has  
 17 changed from the time that you were there?  
 18 A Yes.  
 19 Q When you were there can you give me an idea  
 20 of the size of the laboratory that you were in?  
 21 A In square feet?  
 22 Q Or by length and width, height, anything  
 23 you can do.  
 24 A It was two different rooms about 4 to 600  
 25 square feet.

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1 Christian Holinka 83  
 2 Q And did you work in both rooms?  
 3 A Yes.  
 4 Q Were the Bunsen burners in one room or both  
 5 rooms?  
 6 A In both.  
 7 Q How many Bunsen burners were in the rooms?  
 8 A About two each.  
 9 Q Did these Bunsen burners in their physical  
 10 appearance seem similar to those that you encountered  
 11 when you were at Booth?  
 12 A Yes.  
 13 Q How do you believe that you were exposed to  
 14 asbestos from the Bunsen burners as a part-time worker  
 15 at UC Berkeley?  
 16 A As the flame when it was used frequently,  
 17 the insert became brittle, it generated dust and it  
 18 had to be exposed -- disposed of and replaced by  
 19 another pad.  
 20 Q Was there anything different about the  
 21 nature you believe you were exposed from those Bunsen  
 22 burners at UC Berkeley as opposed to those you  
 23 encountered at Booth?  
 24 A No.  
 25 Q Did you ever have any responsibility for

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1 Christian Holinka 84  
 2 replacing these spent pads while you were working  
 3 part-time at Berkeley?  
 4 A Yes.  
 5 Q And where would you get the replacement  
 6 pads from?  
 7 A The departmental supply cabinet.  
 8 Q And thinking back to the lab at Berkeley,  
 9 where was that located?  
 10 A At the Life Sciences Building in the  
 11 physiology department.  
 12 Q Was it located within the physical space of  
 13 the two rooms that comprised the lab?  
 14 A It was in a separate room, the supply room.  
 15 Q Down a hallway or something like that?  
 16 A Down a hallway, yes.  
 17 Q How many times do you recall picking up  
 18 replacement pads?  
 19 A I do not recall exactly.  
 20 Q Was there --  
 21 A An estimate is once every two or three  
 22 weeks.  
 23 Q And the replacement process would entail  
 24 removing the old pad, then what would happen with it?  
 25 A You dispose the old pad in general garbage,

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1 Christian Holinka 85  
 2 trash. There was to my knowledge no precaution  
 3 required at the time.  
 4 Q In order to remove the pad, did you have to  
 5 remove any screws or snaps or anything to take it away  
 6 from the rest of the burner itself?  
 7 A No, I didn't.  
 8 Q Just lifted it right up and it went?  
 9 A Yes.  
 10 Q Do you know the brand, trade or  
 11 manufacturer's name first of any of the Bunsen burner  
 12 pads that you replaced at Berkeley?  
 13 A I do not. We had standard suppliers and  
 14 the big suppliers were Fisher Scientific, American  
 15 Scientific, Van Waters and Rogers, Senco.  
 16 Q How do you spell Senco?  
 17 A S-E-N-C-O.  
 18 Q Do you know that each of those companies  
 19 was a supplier of materials generally to the lab that  
 20 you worked at part-time?  
 21 A Yes.  
 22 Q How did you know that each of them supplied  
 23 materials of whatever nature?  
 24 A They were major suppliers and I know they  
 25 were used for a number of materials for the

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1 Christian Holinka 86  
 2 laboratory.  
 3 Q What I am trying to find out, sir, is why  
 4 you believe that those companies supplied materials of  
 5 any nature to that lab, how did you come into that  
 6 knowledge?  
 7 A Because they were standard suppliers.  
 8 Q How did you know that they were standard  
 9 suppliers?  
 10 A Well, among other things I ordered from  
 11 them.  
 12 Q When you were at the lab.  
 13 A Yes.  
 14 Q As a part-timer.  
 15 A Yes.  
 16 Q Did these companies have catalogs of their  
 17 material available?  
 18 A Very conspicuously, yes.  
 19 Q Did each one of those companies have  
 20 catalogs at the lab?  
 21 A I do not specifically recall at Berkeley  
 22 during my undergraduate days.  
 23 Q Did the physical appearance of the pads  
 24 that you used at Berkeley seem similar to those that  
 25 you encountered at Booth?

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1 Christian Holinka 87  
 2 A Yes, they did.  
 3 Q Same diameter of the pad area within the  
 4 mesh?  
 5 A Yes.  
 6 Q And same width too?  
 7 A Yes.  
 8 Q How often would you be required to use heat  
 9 mittens when you were part-time at the lab?  
 10 A Several times a week.  
 11 Q And for what application at the lab as a  
 12 part-time worker would you use the mittens?  
 13 A To handle hot glass work.  
 14 Q And where would the glass work be coming  
 15 from?  
 16 A Standard glass work at the laboratory that  
 17 they used for research. Erlenmeyer flasks, other  
 18 flasks, beakers, standard glass material.  
 19 Q What application would require you to use  
 20 the gloves to handle these standard pieces of  
 21 glassware?  
 22 A When you have a flask you put it on the  
 23 Bunsen burner pad, you heat water or whatever liquid,  
 24 you swirl it, obviously you have to use the glove  
 25 because the glass is hot.

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1 Christian Holinka 88  
 2 Q To transport it from point A to point B?  
 3 A Or even to swirl it while it is being  
 4 heated.  
 5 Q I see, to grab the flask itself?  
 6 A To dissolve the material. And you also use  
 7 the mittens when you dry glassware in a hot drying  
 8 oven at very high temperatures and then you handle it.  
 9 If you want to cool it, you take it fast, you take it  
 10 out into the open space.  
 11 Q Besides the Bunsen burners and the mittens,  
 12 do you believe that you personally used any other  
 13 materials that contained asbestos while part-time at  
 14 the lab?  
 15 A I don't know.  
 16 Q Is there anything that as you sit here  
 17 today leads you to believe that there was other  
 18 products that you handled that may have contained  
 19 asbestos there?  
 20 A I don't know.  
 21 Q Besides the products that you handled, do  
 22 you believe that you were exposed to asbestos in any  
 23 other way when you were working part-time at the lab?  
 24 A I don't know.  
 25 Q You cannot give me any other specific way

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1 Christian Holinka 89  
 2 that you think you may have been exposed to asbestos  
 3 when you were at the lab?  
 4 MR. DARCHE: Objection to the form.  
 5 MR. SCHAFFER: I will rephrase the  
 6 question.  
 7 Q Looking back is there any other way that  
 8 you can think of at this time that you may have been  
 9 exposed to asbestos there?  
 10 A I do not know what other equipment may or  
 11 may not have contained asbestos.  
 12 Q Did you --  
 13 A If yes then --  
 14 MR. DARCHE: Don't guess.  
 15 Q Going to the mittens for a moment, did  
 16 these resemble those that you had encountered at  
 17 Booth?  
 18 A Yes.  
 19 Q Was there anything different about their  
 20 physical appearance in terms of their color or their  
 21 size or anything at all that distinguished them from  
 22 those at Booth?  
 23 A No, they were similar.  
 24 Q Do you know specifically the brand, trade  
 25 or manufacturer of the mittens that were used when you

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1 Christian Holinka 90  
 2 were at the lab part-time?  
 3 A No.  
 4 Q Do you believe that they were supplied by  
 5 one of the companies that you have identified?  
 6 A Yes.  
 7 Q Do you know which of those companies, if  
 8 any, actually supplied the mittens while you were  
 9 there?  
 10 A I do not know any specific company. Again,  
 11 they were standard suppliers.  
 12 Q You said that as a part --  
 13 MR. SCHAFFER: Withdrawn.  
 14 Q You said that while working there part-time  
 15 you had some responsibility for ordering supplies; is  
 16 that right?  
 17 A Yes.  
 18 Q Do you specifically recall ordering any  
 19 Bunsen burner pads?  
 20 A No, I never did.  
 21 Q Do you specifically recall ordering any  
 22 mittens while you were there part-time?  
 23 A No, I never did order any.  
 24 Q While you were there part-time, do you know  
 25 who had that responsibility when you were there?

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1 Christian Holinka 91  
 2 A I don't know.  
 3 Q Did you work with other people there?  
 4 A No, I didn't.  
 5 Q Were there other students who held  
 6 part-time positions similar to you?  
 7 A Yes, at other laboratories.  
 8 Q At other laboratories located on the  
 9 campus?  
 10 A In the physiology department, yes, on the  
 11 campus.  
 12 Q Were there additional laboratories in this  
 13 building where other students worked where you did not  
 14 work?  
 15 A I don't know.  
 16 Q Did the two room laboratory in the Life  
 17 Sciences Building have any specific name or room  
 18 number or designation or anything like that?  
 19 A A room number.  
 20 Q Yes.  
 21 A Certainly.  
 22 Q Do you remember what that was?  
 23 A No.  
 24 Q You mentioned also that you took lab  
 25 courses while you were an undergraduate.

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1 Christian Holinka 92  
 2 A Yes.  
 3 Q How many lab courses did you take?  
 4 MR. SCHAFFER: I'm sorry, I will withdraw  
 5 the question.  
 6 Q My question is how many lab courses did you  
 7 take that you believe may have involved asbestos  
 8 exposure.  
 9 A About a half a dozen.  
 10 Q What type of courses were these?  
 11 A Chemistry, physiology.  
 12 Q Did you take these classes in the Life  
 13 Sciences Building?  
 14 A In several buildings, physiology and the  
 15 Life Sciences Building.  
 16 Q Were the physiology classes taken at least  
 17 in part in the same lab where you worked part-time?  
 18 A No.  
 19 Q Different space entirely?  
 20 A Yes.  
 21 Q Just going back for a moment to when you  
 22 were a part-time worker, about how many hours on  
 23 average did you put in there?  
 24 A Between 12 and 20 hours a week.  
 25 Q And who was your supervisor when you were

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1 Christian Holinka 93  
 2 there?  
 3 A Dr. Cook.  
 4 Q Do you know Dr. Cook's first name?  
 5 A Sherburne.  
 6 Q And is Dr. Cook still alive?  
 7 A No.  
 8 Q The classes that you took in chemistry and  
 9 physiology, how do you believe you were exposed to  
 10 asbestos through taking those classes?  
 11 A The asbestos pad, as I said, when exposed  
 12 to high heat disintegrated eventually. There were  
 13 cracks in it and it generated fine dust. I did not  
 14 dispose, that was somebody else's job.  
 15 Q So, it would have been through your use of  
 16 the Bunsen burners and these pads --  
 17 A Yes.  
 18 Q -- at times while taking these classes?  
 19 A Yes.  
 20 Q Was there a standard amount of Bunsen  
 21 burners present in the labs that you would take these  
 22 classes in?  
 23 A One per workbench.  
 24 Q Would you typically work at the same  
 25 workbench each class or would it just be random?

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1 Christian Holinka 94  
 2 A In a given course the same workbench.  
 3 Q Did you wind up taking different courses,  
 4 say in chemistry, that wound up being in the same room  
 5 but different work spaces?  
 6 A I don't think the same room and, therefore,  
 7 also different work spaces.  
 8 Q And then going to the physiology classes,  
 9 did you take different courses in physiology where you  
 10 used these Bunsen burners?  
 11 A Yes.  
 12 Q Were they all in the same classroom or  
 13 different classrooms?  
 14 A Different laboratories.  
 15 Q And different work spaces?  
 16 A Yes.  
 17 Q Do you know the brand, trade or  
 18 manufacturer's name of any of the pads that were used  
 19 on the Bunsen burners that you encountered in any of  
 20 these classes?  
 21 A Of the pads, you're saying?  
 22 Q Yes, of the pads.  
 23 A I do not specifically know the brand names.  
 24 Q Do you know who was the supplier of those  
 25 pads that you encountered specifically in those rooms?

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1 Christian Holinka 95  
 2 A There were standard suppliers also to the  
 3 physiology department.  
 4 Q As a student you did not have  
 5 responsibilities for ordering supplies, right?  
 6 A No, I did not.  
 7 Q Besides encountering the Bunsen burner  
 8 pads, are there any other ways that you think you were  
 9 exposed to asbestos during the course work that you  
 10 took at UC Berkeley?  
 11 A We did use heat mittens but otherwise to my  
 12 knowledge, no.  
 13 Q How often would you need to use a heat  
 14 mitten during the course of a class?  
 15 A At a given session several times.  
 16 Q Did you need to use them during every  
 17 session?  
 18 A No.  
 19 Q And a session or a period was how long,  
 20 sir, about?  
 21 A Typically about twice a week for 12 weeks.  
 22 Q And each session twice a week would be  
 23 about how long?  
 24 A About three hours.  
 25 Q And do you know the brand, trade or

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1 Christian Holinka 96  
 2 manufacturer's name of any of the mittens that you  
 3 used in any of these courses?  
 4 A No.  
 5 Q Were they similar in appearance to the  
 6 mittens that you encountered while working part-time  
 7 in the lab?  
 8 A Yes, they were.  
 9 Q Anything distinguishing in your mind about  
 10 them as opposed to what you saw in the lab?  
 11 A To my knowledge, no.  
 12 Q That is all I am asking is to your  
 13 knowledge.  
 14 A Okay.  
 15 Q Outside of the Bunsen burner pads and the  
 16 mittens, do you believe that you were exposed to  
 17 asbestos in any other way while taking the classes as  
 18 an undergraduate?  
 19 A I do not know.  
 20 Q Can you, as you sit here today, give me any  
 21 other specific way that you think you may have been  
 22 exposed to asbestos from the classes besides what you  
 23 told me?  
 24 A No, I cannot.  
 25 Q Besides the course work in the labs, are

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1 Christian Holinka 97  
 2 there any other ways that you believe that you were  
 3 exposed to asbestos as an undergraduate at UC Berkeley  
 4 through your studies as opposed to work?  
 5 A I do not believe so.  
 6 Q What degree did you get?  
 7 A A BA.  
 8 Q In what?  
 9 A French literature and physiology as a  
 10 minor.  
 11 Q After you graduated did you become employed  
 12 at the school?  
 13 A No, I did not.  
 14 Q What was your next, after you obtained your  
 15 undergraduate degree, what was next in your  
 16 professional career?  
 17 A I started, I worked as a graduate student  
 18 in physiology, I was a graduate student in physiology.  
 19 Q And when did you -- you graduated, I'm  
 20 sorry, undergrad in middle 1962?  
 21 A Yes.  
 22 Q And that would have been sometime in the  
 23 summer?  
 24 A Yes.  
 25 Q And did you go right into the graduate

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1 Christian Holinka 98  
 2 student program at that time?  
 3 A No, I did not.  
 4 Q What happened in between the time that you  
 5 left undergrad and you started graduate studies?  
 6 A I was in New York part-time for a period of  
 7 time not involving any laboratory.  
 8 Q Well, how long were you in New York after  
 9 you finished undergrad?  
 10 A For about six months.  
 11 Q Taking us from when to when?  
 12 A Taking us from the end of the year -- well,  
 13 there was a very brief period I was in medical school.  
 14 Q Okay.  
 15 A But not really in a major, about three  
 16 months.  
 17 Q So, let's kind of break it down a little  
 18 bit more. You finished your undergraduate degree in  
 19 the middle of 1962, and then you started med school,  
 20 would that be in the fall of 1962?  
 21 A There is a kind of a hiatus.  
 22 Q All right.  
 23 A I was at Hunter -- from New York, from  
 24 Berkeley I was at Hunter College as a student for two  
 25 semesters.

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1 Christian Holinka 99  
 2 Q Let me then, what I want to try to do, sir,  
 3 is keep it as ordered chronologically as much as we  
 4 can. So, after you leave UC Berkeley --  
 5 MR. SCHAFFER: Withdrawn.  
 6 Q After you graduate from UC Berkeley, did  
 7 you move to New York at that time?  
 8 A Yes, I did.  
 9 Q So, you moved to New York.  
 10 A Yes.  
 11 Q When do you get to New York approximately?  
 12 A In the fall -- late summer of that year,  
 13 1962.  
 14 Q From the time that you graduated until you  
 15 came to New York, did you work at all in California?  
 16 A No.  
 17 Q Why did you come to New York?  
 18 A I like New York.  
 19 Q And when you came to New York, is that when  
 20 you began your studies at Hunter?  
 21 A Yes.  
 22 Q Were those full-time studies?  
 23 A Yes.  
 24 Q And what degree or types of course work  
 25 were you pursuing at that time?

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1 Christian Holinka 100  
 2 A Graduate work, graduate studies.  
 3 Q And you started that course work in the  
 4 fall of 1962?  
 5 A Yes.  
 6 Q And you took it for two semesters?  
 7 A Yes.  
 8 Q That would take us into the late spring or  
 9 early summer of 1963?  
 10 A That's correct.  
 11 Q What was the nature of the studies that you  
 12 were pursuing at Hunter at that time?  
 13 A Biology.  
 14 Q Were you accepted into a graduate program?  
 15 A Yes.  
 16 Q Do you believe that you were exposed to  
 17 asbestos in any of the courses that you took over  
 18 those two semesters at Hunter?  
 19 A Yes.  
 20 Q And how do you believe that you were  
 21 exposed to asbestos while attending the course work at  
 22 Hunter for those two semesters?  
 23 A There was one chemistry laboratory that had  
 24 practical sessions, laboratory sessions.  
 25 Q And how do you believe you were exposed to

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1 Christian Holinka 101  
 2 asbestos taking those sessions?  
 3 A By using Bunsen burners. I do not recall  
 4 using heat mittens.  
 5 Q What building was the laboratory in, if you  
 6 know?  
 7 A On the Park Avenue building.  
 8 Q And was this one class that you took or  
 9 more than one class in the laboratory?  
 10 A I believe it was only one class.  
 11 Q And do you know whether this was in your  
 12 first semester or second semester there?  
 13 A I don't remember.  
 14 Q How long did that class typically last?  
 15 A One semester, approximately four months.  
 16 Q And each week how many sessions and how  
 17 long were they?  
 18 A I believe one session.  
 19 Q And how many hours would the session be?  
 20 A Three hours.  
 21 Q And do you believe that you were exposed to  
 22 asbestos from the Bunsen burners at this laboratory in  
 23 a fashion similar to those that you described in your  
 24 prior employments and course work?  
 25 A Yes.



<p style="text-align: right;">Page 46</p> <p>1 Christian Holinka 102</p> <p>2 Q Was there anything physically different</p> <p>3 about the Bunsen burners there as opposed to ones you</p> <p>4 had encountered before?</p> <p>5 A No.</p> <p>6 Q Do you know the brand, trade or</p> <p>7 manufacturer's name of any of the Bunsen burners or</p> <p>8 any of their components that you saw at the chemistry</p> <p>9 lab at Hunter?</p> <p>10 A No.</p> <p>11 Q Do you know who supplied any of the Bunsen</p> <p>12 burners or Bunsen burner components that you used</p> <p>13 there at that lab?</p> <p>14 A No, I don't.</p> <p>15 Q Did you ever have to replace any of the</p> <p>16 Bunsen burner pads there in a fashion similar to what</p> <p>17 you told us before?</p> <p>18 A No, I did not.</p> <p>19 Q Are there any other ways --</p> <p>20 MR. SCHAFFER: Withdrawn.</p> <p>21 Q Are there any other ways that you believe</p> <p>22 you were exposed to asbestos while attending school at</p> <p>23 Hunter?</p> <p>24 A Not to my knowledge.</p> <p>25 Q Why did you stop attending Hunter?</p>	<p style="text-align: right;">Page 48</p> <p>1 Christian Holinka 104</p> <p>2 (Whereupon, at 11:20 A.M., a short recess</p> <p>3 was taken)</p> <p>4 (Back on the record at 11:30 A.M.)</p> <p>5 Q Sir, we are back on the record and I think</p> <p>6 we had your chronology up to when you were starting</p> <p>7 medical school at McGill in the fall of 1963. You</p> <p>8 told us that you were in medical school for</p> <p>9 approximately three months?</p> <p>10 A That's correct.</p> <p>11 Q Until around the holiday season of 1953?</p> <p>12 A No, '63.</p> <p>13 Q I'm sorry, '63.</p> <p>14 A Early '64, I believe.</p> <p>15 Q Did you finish one semester there and start</p> <p>16 another?</p> <p>17 A Yes. I did not start another.</p> <p>18 Q During the time that you were there for</p> <p>19 that one semester, what types of course work did you</p> <p>20 take?</p> <p>21 A Mainly lecture courses and one laboratory</p> <p>22 course.</p> <p>23 Q Do you believe that any of your course work</p> <p>24 while you were attending medical school at McGill</p> <p>25 caused you to be exposed to asbestos?</p>
<p style="text-align: right;">Page 47</p> <p>1 Christian Holinka 103</p> <p>2 A I was accepted to medical school.</p> <p>3 Q And what medical school?</p> <p>4 A McGill University, Montreal.</p> <p>5 Q And were you accepted to begin course work</p> <p>6 in the fall of 1963?</p> <p>7 A That's correct.</p> <p>8 Q From the time you left your graduate</p> <p>9 studies at Hunter until the time that you --</p> <p>10 MR. SCHAFFER: Withdrawn.</p> <p>11 Q Did you actually start medical school at</p> <p>12 McGill?</p> <p>13 A Yes, yes, I did.</p> <p>14 Q From the time you left Hunter until the</p> <p>15 time you went to Montreal to begin medical school,</p> <p>16 what type of employment did you have, if any?</p> <p>17 A I did not have any employment.</p> <p>18 Q That summer you did not work?</p> <p>19 A Right.</p> <p>20 Q What did you do?</p> <p>21 A Read.</p> <p>22 Q To get ready --</p> <p>23 A Listen to music.</p> <p>24 MR. DARCHE: Could we take a quick break,</p> <p>25 please.</p>	<p style="text-align: right;">Page 49</p> <p>1 Christian Holinka 105</p> <p>2 A No, I was not, I do not believe having been</p> <p>3 exposed to asbestos.</p> <p>4 Q And did you leave medical school for</p> <p>5 academic reasons?</p> <p>6 A No.</p> <p>7 Q Why did you leave medical school?</p> <p>8 A Because I didn't like the medical</p> <p>9 curriculum.</p> <p>10 Q While you were attending medical school at</p> <p>11 McGill, was there any time to hold part-time work?</p> <p>12 A No.</p> <p>13 Q And after you left medical school, what did</p> <p>14 you do next?</p> <p>15 A I went back to Berkeley, California.</p> <p>16 Q You had mentioned at one point that you</p> <p>17 were in New York part-time for about six months</p> <p>18 although we had not discussed that yet, are we still</p> <p>19 before that period of time happens?</p> <p>20 A We are before that period of time.</p> <p>21 Q So, you went back to Berkeley and --</p> <p>22 A And it was longer than six months.</p> <p>23 Q Then when you went back to Berkeley, what</p> <p>24 did you do when you went back to Berkeley?</p> <p>25 A I worked at the same research laboratory</p>

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1 Christian Holinka 106  
 2 that I had worked in as an undergraduate under  
 3 essentially the same conditions and the same space.  
 4 Q Were you taking classes at this time when  
 5 you went back to Berkeley?  
 6 A No.  
 7 Q So, you were an employee of the school; is  
 8 that fair to say?  
 9 A Yes.  
 10 Q And when you went back to work at the lab  
 11 at Berkeley, it was in the same physical space, the  
 12 two rooms that you discussed in the Life Sciences  
 13 Building?  
 14 A That's correct.  
 15 Q As a full-time employee what was your shift  
 16 there?  
 17 A Depended on the project. I worked  
 18 full-time essentially during the day.  
 19 Q Let me ask --  
 20 A But it was flexible.  
 21 Q Let me ask it a different way: On average  
 22 how many hours a week did you put in?  
 23 A Forty hours.  
 24 Q And how long did you hold this position as  
 25 an employee of the university working in the lab?

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1 Christian Holinka 107  
 2 A Until approximately August of that year,  
 3 1964.  
 4 Q Did you go right back to Berkeley after you  
 5 ended your studies at McGill?  
 6 A Yes.  
 7 Q So, the total time back at Berkeley is  
 8 somewhere in the seven or eight month range; is that  
 9 fair, sound about right?  
 10 A So far, yes.  
 11 Q Right.  
 12 A Where we are now.  
 13 Q Where we are now.  
 14 A Yes.  
 15 Q During the time that you were back at the  
 16 laboratory as an employee of the school working  
 17 full-time, do you believe that you were exposed to  
 18 asbestos?  
 19 A Yes.  
 20 Q Do you believe that you were exposed to --  
 21 MR. SCHAFFER: Withdrawn.  
 22 Q For this six month period how do you think  
 23 you were exposed to asbestos?  
 24 A By Bunsen burner pads and heat insulating  
 25 mittens.

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1 Christian Holinka 108  
 2 Q During this time that you were working for  
 3 the school at the lab, did you have responsibility for  
 4 ordering any of these materials that were used during  
 5 this period?  
 6 A No, I did not.  
 7 Q Was there anything different about the  
 8 Bunsen burner pads in terms of their physical  
 9 appearance during this employment as compared to those  
 10 you had seen previously?  
 11 A No.  
 12 Q Was there anything different about the  
 13 appearance of the mittens?  
 14 A No.  
 15 Q And do you know the brand, trade or  
 16 manufacturer's names of any of the pads that you  
 17 encountered during this time that you were employed by  
 18 the school up to 1964, August?  
 19 A It was standard suppliers.  
 20 Q But specifically with respect to the pads  
 21 that you used or encountered during that period in  
 22 1964, do you know who made or supplied them?  
 23 A No, I don't. But they were routinely  
 24 ordered from standard suppliers, the companies; Fisher  
 25 Scientific, American Scientific, Senco, Van Waters and

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1 Christian Holinka 109  
 2 Rogers.  
 3 Q Do you know who had the responsibility for  
 4 ordering materials that were used during that time  
 5 period in 1964 that you were working at the lab?  
 6 A No, I do not. They were centrally ordered.  
 7 Q Do you know specifically the brand, trade  
 8 or manufacturer's name of the mittens that you used  
 9 during that time period in 1964?  
 10 A No, I do not.  
 11 Q Did you use or encounter both of those  
 12 materials --  
 13 MR. SCHAFFER: Withdrawn.  
 14 Q Was there anything different about the  
 15 frequency that you used these materials while you were  
 16 employed as opposed to that when you were working  
 17 part-time?  
 18 A I used them proportionately more frequent.  
 19 Q As a full-time person?  
 20 A Yes.  
 21 Q Who was your supervisor or the person you  
 22 reported to there?  
 23 A Dr. Cook, Professor Sherburne S. Cook.  
 24 Q How would you spell Sherburne?  
 25 A S-H-E-R-B-U-R-N-E.



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1 Christian Holinka 110  
 2 Q Are there any other -- as you sit here  
 3 today, do you believe that you were exposed to  
 4 asbestos in any other way working at the lab as a  
 5 full-time employee in 1964?  
 6 A I do not know.  
 7 Q You cannot tell me any other specific ways  
 8 at this time?  
 9 A No.  
 10 Q The number of burners were the same in both  
 11 rooms as you had seen before?  
 12 A Yes.  
 13 Q Was the attendant equipment the same as it  
 14 had been before?  
 15 A Yes.  
 16 Q What happened next after you were working  
 17 full-time in August of 1964?  
 18 A I was accepted as a graduate student in  
 19 physiology by the University of California, Berkeley.  
 20 Q And did you ultimately obtain your graduate  
 21 degree?  
 22 A Yes.  
 23 Q When did you get the graduate degree?  
 24 A 1968.  
 25 Q When about?

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1 Christian Holinka 111  
 2 A Summer, I think in August 1968.  
 3 Q And what was the nature of the graduate  
 4 degree?  
 5 A Physiology.  
 6 Q Did you go to classes full-time during the  
 7 time period you were a graduate student?  
 8 A I did full-time research and involving some  
 9 courses.  
 10 Q During the time period August 1964 to  
 11 August 1968, did you hold any employment at all?  
 12 A Yes.  
 13 Q Were you working at the lab again?  
 14 A No. Perhaps it -- probably, if I may  
 15 suggest, it would be easier to go chronological.  
 16 Q That would be fine and I would appreciate  
 17 that.  
 18 When you started in August of 1964, were  
 19 you taking courses full-time?  
 20 A Courses and research full-time.  
 21 Q And how long did that remain constant,  
 22 courses and classes full-time?  
 23 A Until 1966.  
 24 Q During the time 1964 to 1966, did you hold  
 25 any employment, did you work at all?

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1 Christian Holinka 112  
 2 A No.  
 3 Q Were you a full-time student?  
 4 A Yes.  
 5 Q Do you believe that you were exposed to  
 6 asbestos being a full-time graduate student from 1964  
 7 to 1966?  
 8 A Yes, I was.  
 9 Q And how do you believe you were exposed to  
 10 asbestos during that time period?  
 11 A Bunsen burner pads and heat insulating  
 12 mittens.  
 13 Q And were these items located within the  
 14 same Life Sciences Building laboratory that we have  
 15 been discussing?  
 16 A Not the same laboratory but the same  
 17 building, the same floor.  
 18 Q Then let's talk about the room that this  
 19 took place. What did this laboratory look like, first  
 20 in terms of the number of rooms?  
 21 A It was one room, a large laboratory.  
 22 Q How many Bunsen burners were in there?  
 23 A An estimated six to eight.  
 24 Q Was there anything different about how  
 25 these Bunsen burners and their pads appeared as

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1 Christian Holinka 113  
 2 opposed to those you had encountered in the other lab  
 3 in the building?  
 4 A No, there wasn't.  
 5 Q Was there anything different about the  
 6 appearance of the mittens that you had encountered?  
 7 A No, there wasn't.  
 8 Q As a full-time graduate student you were  
 9 taking courses in the labs; is that right?  
 10 A Courses in the classroom and research, my  
 11 own research project at the laboratory.  
 12 Q Did you have to complete a dissertation of  
 13 some sort to get your degree?  
 14 A Yes, I did.  
 15 Q What was your dissertation?  
 16 A Estrogen receptors in the hypothalamus of  
 17 the brain.  
 18 Q And that required you to do research in the  
 19 lab in order to complete your paper?  
 20 A Yes, I did.  
 21 Q Did you have a faculty advisor that you  
 22 were required to report the status of your project to?  
 23 A Yes, I did.  
 24 Q And did that person work with you --  
 25 MR. SCHAFER: Withdrawn.

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1 Christian Holinka 114  
 2 Q Did that person have responsibility to be  
 3 with you while you were conducting the research side  
 4 of the paper?  
 5 A She was the head of the laboratory and  
 6 supervised my research, the answer is yes.  
 7 Q Who was that?  
 8 A Dr. Paola Timiras. Should I spell it?  
 9 Q Yes, that would be great.  
 10 A First name P-A-O-L-A, last name  
 11 T-I-M-I-R-A-S.  
 12 Q And would you have any information as to  
 13 whether she is still alive?  
 14 A No, I don't.  
 15 Q But the last time you would have spoken  
 16 with her had been when you were at the university at  
 17 some point?  
 18 A No, it wasn't.  
 19 Q When was it?  
 20 A It was about six years ago.  
 21 Q Where was she living at the time?  
 22 A In Berkeley, California.  
 23 Q Was she still at the school?  
 24 A That was the occasion of her retirement but  
 25 she remained an active emeritus professor.

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1 Christian Holinka 115  
 2 Q Do you know specifically the brand, trade  
 3 or manufacturer's name of any of the Bunsen burner  
 4 pads that you encountered while a graduate student  
 5 during this time period 1964 to 1966?  
 6 A They were ordered from standard suppliers,  
 7 the names I have mentioned before.  
 8 Q You were not responsible for doing the  
 9 ordering during this period?  
 10 A No, I was not.  
 11 Q Who was?  
 12 A A simple supply person.  
 13 Q I do not understand what that means. Can  
 14 you give me an idea what you are talking about when  
 15 you use that term?  
 16 A Well, typically in the department there was  
 17 a technician who was responsible for supplies. If you  
 18 needed specific research supplies for your own  
 19 research, you looked at the catalog, Fisher  
 20 Scientific, the main catalogs, Van Waters and Rogers,  
 21 and picked out the things you needed very specifically  
 22 for your research. General supplies were ordered  
 23 centrally periodically because they were standard  
 24 supplies at each laboratory.  
 25 Q And when you use the term "standard

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1 Christian Holinka 116  
 2 supplies," would it be fair to say that these were  
 3 items regularly used that would try to be kept in  
 4 stock for use in the labs?  
 5 A That is correct to say.  
 6 Q Was the stockroom that supported this other  
 7 one room lab you are in the same stockroom that  
 8 supported the lab we talked about before?  
 9 A To an extent, yes, the answer is yes.  
 10 Q Did you while you were a full-time graduate  
 11 student need to replace any of the pads?  
 12 A Yes, I did.  
 13 Q When you needed to replace them, where  
 14 would you go to get the replacement pads?  
 15 A From the supply room.  
 16 Q The same supply room we talked about?  
 17 A Yes.  
 18 Q Are there any other specific ways that you  
 19 believe that you were exposed to asbestos while  
 20 working at this lab from 1964 to 1966?  
 21 A I do not know.  
 22 Q As you sit here today, do you have any  
 23 reason to believe that you were exposed to asbestos in  
 24 any other way besides what you have told us with  
 25 respect to this lab?

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1 Christian Holinka 117  
 2 A I do not know.  
 3 Q You obtained your graduate degree in --  
 4 MR. SCHAFER: Withdrawn.  
 5 Q What happens in 1966?  
 6 A In 1966 I was admitted to graduate school  
 7 at Berkeley in comparative literature.  
 8 Q So, in 1966 did you get your graduate  
 9 degree in physiology?  
 10 A Yes.  
 11 Q And this was the degree that had the paper  
 12 you told us about associated with that.  
 13 A Yes.  
 14 Q And then you went on for another graduate  
 15 degree there?  
 16 A Yes, I did.  
 17 Q And did you get that second degree?  
 18 A Yes, I did.  
 19 Q And is that the degree you got in August of  
 20 1968?  
 21 A Yes, that's correct.  
 22 Q During the time that you were going for  
 23 this additional graduate degree, did you work at all?  
 24 A As a teaching assistant.  
 25 Q Did you do any work in the lab at all?

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1 Christian Holinka 118  
 2 A No.  
 3 Q Do you believe that you were exposed to  
 4 asbestos in any way from the time period 1966 to  
 5 August 1968?  
 6 A I do not believe so but I don't know.  
 7 Q We are in August of 1968 now. Did you go  
 8 on to take any other classes at Berkeley once you had  
 9 obtained these two graduate degrees on top of your  
 10 undergraduate degree?  
 11 A I continued as a graduate student.  
 12 Q And were you continuing as a full-time  
 13 graduate student starting in August of 1968?  
 14 A Yes. Together with teaching as a teaching  
 15 assistant.  
 16 Q And what types of course work were you  
 17 involved in as a teaching assistant?  
 18 A French language.  
 19 Q More associated with your literature  
 20 graduate degree?  
 21 A Yes.  
 22 Q And how long did you take additional  
 23 courses and also work as a teaching assistant?  
 24 A And do library research until 1971.  
 25 Q Did you obtain another degree?

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1 Christian Holinka 119  
 2 A No, I didn't. However, during that period  
 3 I had a stipend for a year in Paris and I do have a  
 4 certificate, a degree from the Sorbonne.  
 5 Q From the time frame of August of 1968 until  
 6 1971, do you believe that you were exposed to asbestos  
 7 in any way?  
 8 A I do not know but I don't believe so.  
 9 Q Besides working as a teaching assistant,  
 10 did you hold any other for-pay employments during this  
 11 time period?  
 12 A I taught intermittently language at the  
 13 Berlitz School and a course in literature in Berkeley  
 14 above the level of teaching assistant.  
 15 Q And during that time period do you recall  
 16 holding any other jobs aside from what you told us?  
 17 A No.  
 18 MR. SCHAFER: Off the record for one  
 19 second.  
 20 (Discussion held off the record)  
 21 Q When did you finish this period of time in  
 22 your life when you were teaching literature and taking  
 23 graduate classes, you told us it was in 1971, I am  
 24 trying to find out when.  
 25 A Yes. In the spring semester ending in May

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1 Christian Holinka 120  
 2 or June.  
 3 Q And after that what was the next thing that  
 4 you did in your life?  
 5 A I was accepted as a graduate student in  
 6 biological sciences at the State University of New  
 7 York at Stony Brook.  
 8 Q And how long did you attend graduate school  
 9 at SUNY Stony Brook?  
 10 A Until 1974.  
 11 Q What month did you finish there?  
 12 A In July, end of June or July.  
 13 Q Did you get a degree from SUNY Stony Brook?  
 14 A Yes, I did.  
 15 Q What was that degree?  
 16 A PhD.  
 17 Q In what?  
 18 A Biological sciences.  
 19 Q Was this full-time academic studies?  
 20 A It was full-time academic studies but I  
 21 also worked part-time in addition.  
 22 Q Where did you work part-time?  
 23 A Columbia University Presbyterian Medical  
 24 Center, clinical chemistry.  
 25 Q When did you start doing the part-time work

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1 Christian Holinka 121  
 2 at Columbia?  
 3 A 1971.  
 4 Q Would it have been contemporaneous with the  
 5 course work at SUNY?  
 6 A Yes, it was.  
 7 Q Did you get the job through connections at  
 8 SUNY?  
 9 A No, I did not.  
 10 Q How did you come to get that job?  
 11 A I applied personally through somebody, a  
 12 professor there who I knew.  
 13 Q How long did you work in the clinical  
 14 chemistry department at Columbia University?  
 15 A Until 1974.  
 16 Q And was it basically employment there  
 17 continuous with the time that you were taking the  
 18 studies at SUNY Stony Brook?  
 19 A Yes.  
 20 Q During the time that you were out at Stony  
 21 Brook, do you believe that you were exposed to  
 22 asbestos while taking your studies?  
 23 A Yes, I was.  
 24 Q During the time that you were working for  
 25 Columbia, do you believe that you were exposed to

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1 Christian Holinka 122  
2 asbestos?  
3 A Yes, I was exposed.  
4 Q We are going to break them both down then.  
5 When you were taking the courses at SUNY  
6 Stony Brook, did you also take course work during the  
7 summers?  
8 A Yes.  
9 Q And how do you believe that you were  
10 exposed to asbestos when you were taking the graduate  
11 school studies at Stony Brook?  
12 A In my research for my degree.  
13 Q And how do you believe in conducting this  
14 research you were exposed to asbestos?  
15 A Through Bunsen burner pads and heat  
16 insulating mittens.  
17 Q With what frequency would you be --  
18 MR. SCHAFFER: Withdrawn.  
19 Q Did you handle both of these types of  
20 items --  
21 A Yes.  
22 Q -- while you were at SUNY Stony Brook?  
23 A Yes, I did.  
24 Q With what frequency would you be handling  
25 Bunsen burner pads?

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1 Christian Holinka 123  
2 A Regularly.  
3 Q Any way to quantify what "regularly" would  
4 be?  
5 MR. DARCHE: Don't guess.  
6 A Daily, daily. The days I was at the  
7 laboratory obviously.  
8 Q Where was the laboratory that you used  
9 these pads at SUNY Stony Brook?  
10 A In the anatomy department.  
11 Q Did you work out of one lab in the anatomy  
12 department?  
13 A Yes.  
14 Q Do you know if that lab had any other type  
15 of designation by room number or name or something  
16 like that?  
17 A By room number, I don't recall the name.  
18 Q Was it the first floor, second floor or  
19 something like that?  
20 A First floor.  
21 Q Describe for me what that lab looked like  
22 first in terms of its dimensions.  
23 A Medium size, square feet I cannot estimate.  
24 Q Did it have work stations or tables?  
25 A About three large benches.

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1 Christian Holinka 124  
2 Q And how many Bunsen burners were in there?  
3 A I would estimate three.  
4 Q One per bench, you think?  
5 A Yes, pretty much.  
6 Q How do you believe that you were exposed to  
7 asbestos from the Bunsen burner pads there?  
8 A As the Bunsen burner experienced heat, the  
9 material degenerated, cracked and emitted dust.  
10 Q Did these pads that we are talking about  
11 appear similar in their appearance to those that you  
12 had encountered previous to that?  
13 A Yes, they did.  
14 Q Was there anything different about their  
15 size, their shape, their consistency of the material  
16 or anything else from those that you had encountered  
17 previously?  
18 A To my knowledge, no.  
19 Q Did the circumference of the material  
20 inside the mesh look the same to you?  
21 A Yes.  
22 Q Did you have to at any time replace those  
23 pads that you encountered at the lab in the anatomy  
24 department at Stony Brook?  
25 A Yes, I did.

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1 Christian Holinka 125  
2 Q And where would you go to get replacement  
3 pads on those occasions?  
4 A The supply room in biology.  
5 Q And where would that be in relation to the  
6 anatomy department that you were in?  
7 A That was in a different building.  
8 Q How often do you recall getting replacement  
9 pads over that period of time that you were working  
10 out of that lab? I'm sorry, doing research out of  
11 that lab.  
12 A About no more than once a month.  
13 Q Did the pads when you picked them up from  
14 the supply area come packaged in any way?  
15 A No.  
16 Q How were they stored there?  
17 A I do not know how the supplier supplied  
18 them. I would --  
19 Q Let me see if I understand the process.  
20 You would walk into the supply room and would there be  
21 somebody there supporting the supply room?  
22 A Yes.  
23 Q And would you ask the person in there I  
24 need X-Y-Z and that person would go get it?  
25 A Exactly, yes.

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1 Christian Holinka 126  
 2 Q And you would not have an opportunity to  
 3 see how they were stored there, right?  
 4 A No.  
 5 Q Did you have any responsibility for  
 6 ordering any Bunsen burner pads when you were doing  
 7 your research at this lab?  
 8 A No, I did not.  
 9 Q Do you know the brand, trade or  
 10 manufacturer's name specifically of those pads that  
 11 were supplied to you and used there?  
 12 A They were supplied by standard suppliers.  
 13 Q I guess my question, sir, is if you did not  
 14 do the ordering of the supplies, do you know  
 15 specifically who supplied the --  
 16 A Specifically I --  
 17 MR. DARCHE: I am going to object to the  
 18 form as being argumentative.  
 19 Q And I do not mean to be argumentative, sir.  
 20 I am just trying to establish that you did not order  
 21 the pads, right?  
 22 A That is correct.  
 23 Q And was there anything about the pads  
 24 identifying who supplied them on the pad itself?  
 25 A No, there wasn't.

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1 Christian Holinka 127  
 2 Q No logos or writing --  
 3 A No.  
 4 Q -- or anything imprinted or embossed on the  
 5 material?  
 6 A No.  
 7 Q How often would you encounter the --  
 8 MR. SCHAFFER: Withdrawn.  
 9 Q How often would you use the mittens when  
 10 you were doing your research at this lab?  
 11 A About once every two days.  
 12 Q Did you ever have to replace the mittens  
 13 that you were using at the lab?  
 14 A Yes.  
 15 Q And would you when you needed to get  
 16 replacement mittens go to the same supply person in  
 17 the supply room?  
 18 A Yes.  
 19 Q Do you know specifically the brand, trade  
 20 or manufacturer's name of the mittens that you used  
 21 there?  
 22 A No.  
 23 Q Do you know who supplied specifically those  
 24 mittens that you used there?  
 25 A No.

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1 Christian Holinka 128  
 2 Q Did those mittens appear similar to those  
 3 that you had encountered previously in your career?  
 4 A Yes.  
 5 Q They were one thumb and then one unit  
 6 covering all of the fingers?  
 7 A That's correct.  
 8 Q And did they go approximately the same way  
 9 up your hand?  
 10 A That's correct.  
 11 Q And in terms of their consistency and  
 12 color, everything was similar to that which you had  
 13 seen before?  
 14 A Yes.  
 15 Q Let me ask you with respect to the pads at  
 16 this anatomy department, why do you think that they  
 17 contained asbestos?  
 18 A It was general knowledge that the centers  
 19 contained asbestos.  
 20 Q And how did you first become aware of this  
 21 general knowledge that the center was asbestos?  
 22 A I could not tell you the time.  
 23 Q Can you tell me how you came to this  
 24 general knowledge?  
 25 A Through colleagues, co-workers.

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1 Christian Holinka 129  
 2 Q Did they specifically, whoever it was,  
 3 advise you that the material did contain asbestos?  
 4 A No.  
 5 Q Do you know what, if any, other materials  
 6 might provide the same sort of abilities as asbestos  
 7 that may have been used on these pads?  
 8 MR. DARCHE: Objection.  
 9 Q But did you understand my question, sir?  
 10 A Yes.  
 11 Q You can answer the question then.  
 12 A Can I?  
 13 Q Yes.  
 14 A No, I don't know.  
 15 Q And why do you believe that the mittens  
 16 that you used at the anatomy department contained  
 17 asbestos?  
 18 A I believe it was specified in the catalog,  
 19 "asbestos mittens."  
 20 Q You did not have the responsibility for  
 21 ordering the mittens, right?  
 22 A No, I did not.  
 23 MR. DARCHE: Objection, asked and answered.  
 24 If I object wait for me to object before  
 25 you answer.



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1 Christian Holinka 130  
 2 Q When was the first time that you came to  
 3 believe that the mittens that you were using contained  
 4 asbestos?  
 5 A I do not recall the exact time.  
 6 Q Can you give me, looking back up to where  
 7 we are right now, whether it was before you were  
 8 taking your course work at SUNY Stony Brook or after  
 9 that?  
 10 MR. DARCHE: I am just going to object.  
 11 Don't guess.  
 12 The witness has already testified as to  
 13 what he recalls.  
 14 MR. SCHAFFER: Well, I am asking him the  
 15 basis for his recollection that they actually  
 16 were asbestos.  
 17 MR. DARCHE: So ask him that.  
 18 Q Why do you believe the mittens --  
 19 MR. DARCHE: You already asked him that.  
 20 MR. SCHAFFER: Right.  
 21 Q And my question is when was the first time  
 22 that you came to the belief that mittens that you used  
 23 contained asbestos.  
 24 MR. DARCHE: I am just going to object to  
 25 the form.

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1 Christian Holinka 131  
 2 You can answer, if you can.  
 3 A I do not recall the exact time.  
 4 Q And this is one of those times, sir, that I  
 5 am entitled to probe a little further and try and get  
 6 a best estimate as to when you came to this knowledge.  
 7 MR. DARCHE: But don't guess.  
 8 Q Right, nobody is asking you to guess.  
 9 A I would have to guess.  
 10 Q That is fair. Nobody wants you to.  
 11 When you would receive the mittens from the  
 12 supply person, did they come packaged in any way?  
 13 A No, not to my knowledge.  
 14 Q And would you have any understanding as to  
 15 how long a pair of mittens would last when you were  
 16 doing your research at SUNY Stony Brook?  
 17 A Relatively long because I was the only  
 18 person at the laboratory, that's the only person using  
 19 them. Relatively long, I would guess four months.  
 20 Q And when the mittens got to a point where  
 21 you felt that they had to be replaced, what would you  
 22 do with them?  
 23 A I would dispose of them and get a new one,  
 24 set from the supply room.  
 25 Q As you sit here today are there any other

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1 Christian Holinka 132  
 2 specific ways that you believe you were exposed to  
 3 asbestos when you were doing your research work at the  
 4 SUNY Stony Brook anatomy department lab?  
 5 A I do not know.  
 6 Q Was the physical layout of the benches and  
 7 equipment that may have been in the lab constant from  
 8 when you first started doing your research there until  
 9 when you left?  
 10 A Yes.  
 11 Q Can you estimate how many hours per week  
 12 you would put in part-time at the Columbia University  
 13 clinical chemistry department during the time you were  
 14 there?  
 15 A Approximately 12 hours.  
 16 Q And this was located where on Columbia  
 17 Presbyterian's grounds?  
 18 A The main building on 168th Street.  
 19 Q What floor was the area where you worked?  
 20 A I don't remember.  
 21 Q Was it in a laboratory as well?  
 22 A Yes.  
 23 Q And did you work in this one laboratory the  
 24 entire --  
 25 A Yes.

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1 Christian Holinka 133  
 2 Q -- time that you were working there?  
 3 A Yes.  
 4 Q And how do you believe you were exposed to  
 5 asbestos there?  
 6 A I used Bunsen burners and heat insulating  
 7 mittens.  
 8 Q While you were doing this part-time work at  
 9 Columbia, did you have responsibility for ordering  
 10 either of those materials that you used?  
 11 A No, I did not.  
 12 Q Did you use any other materials in the  
 13 course of your part-time work there that you believe  
 14 caused you to be exposed to asbestos?  
 15 A I do not know.  
 16 Q Do you believe that you were exposed to  
 17 asbestos from the Bunsen burner pads in a fashion  
 18 similar to that as you told us at the other places you  
 19 talked about?  
 20 A That's correct.  
 21 Q Anything different about the way you think  
 22 you were exposed?  
 23 A No.  
 24 Q Was there anything different physically  
 25 about how the Bunsen burner pads looked as opposed to

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1 Christian Holinka 134  
 2 what you encountered before?  
 3 A No.  
 4 Q While you were doing the part-time work at  
 5 Columbia University, did you have to on occasion  
 6 replace the pads?  
 7 A Yes.  
 8 Q How many times did you do that?  
 9 A I want to modify this. They were replaced,  
 10 I did not replace them myself.  
 11 Q How would the replacement process work  
 12 there then?  
 13 A I do not know.  
 14 Q Would it be a situation where you would  
 15 show up one day and it would appear to be a new pad  
 16 present?  
 17 A Yes.  
 18 Q Do you know where the new pads would come  
 19 from?  
 20 A I don't.  
 21 Q Did you have to replace any of the heat  
 22 mittens that was used there at any time?  
 23 A No.  
 24 Q The heat mittens that you used there, how  
 25 often would you use them?

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1 Christian Holinka 135  
 2 A No more than once every two weeks.  
 3 Q You told us that you averaged about 12  
 4 hours a week there during this part-time work?  
 5 A Yes.  
 6 Q Would that be broken over one day or  
 7 several days or how did that typically fall?  
 8 A Two days.  
 9 Q Two six-hour days on average?  
 10 A Yes.  
 11 Q Perhaps --  
 12 A That makes it 18 hours a week, I worked  
 13 from midnight to nine in the morning.  
 14 Q So, you worked there three times a week,  
 15 midnight to nine?  
 16 A Twice a week.  
 17 Q The lab was open continuously?  
 18 A Yes, sure.  
 19 Q Do you know the brand, trade or  
 20 manufacturer's name of the mittens that you used at  
 21 Columbia Presbyterian?  
 22 A No, I do not.  
 23 Q Do you know the brand, trade or  
 24 manufacturer's name of the Bunsen burner pads that  
 25 were present at Columbia?

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1 Christian Holinka 136  
 2 A I do not.  
 3 Q Can you tell me any other specific ways  
 4 that you believe you may have been exposed to asbestos  
 5 while working part-time at Columbia University?  
 6 A No, I cannot tell you.  
 7 Q In 1974 you got your PhD; is that right?  
 8 A Yes.  
 9 MR. SCHAFER: Off the record for a second.  
 10 (Discussion held off the record)  
 11 Q In July of 1974 you get your degree from  
 12 SUNY Stony Brook, your PhD and what happens next in  
 13 the course of your professional career?  
 14 A I became a post-doctoral fellow at the  
 15 University of Southern California.  
 16 Q And was this at Berkeley again or --  
 17 A Los Angeles.  
 18 Q And how long were you a post-doctoral  
 19 fellow?  
 20 A Until 1977.  
 21 Q And what types of things did you do as a  
 22 post-doctoral fellow there?  
 23 A Biological research and teaching.  
 24 Q What portion or percentage of your time was  
 25 dedicated to research as opposed to teaching?

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1 Christian Holinka 137  
 2 A About 90 percent research, 90 to 95  
 3 percent.  
 4 Q When you were doing your research, did you  
 5 conduct it in one particular area of USC Los Angeles?  
 6 A Yes. At the Gerontology Building.  
 7 Q And where within the Gerontology Building  
 8 did you do this research?  
 9 A Second floor.  
 10 Q What were the dimensions or the layout of  
 11 the space you worked out of?  
 12 A Four rooms, variable size ranging from an  
 13 estimated 400 square feet to 800 square feet,  
 14 estimated.  
 15 Q And were these rooms comprised of both  
 16 offices and laboratories?  
 17 A Offices were separate.  
 18 Q So, the four rooms, were they all labs?  
 19 A Yes.  
 20 Q Did you work in all of those rooms?  
 21 A Yes.  
 22 Q Did you have graduate assistants working  
 23 with you during this time period?  
 24 A Yes, I did.  
 25 Q What were their names of some of these



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1 Christian Holinka 138  
 2 people?  
 3 A Monty Heckland (phonetic), undergraduate  
 4 assistant.  
 5 Q Anybody else?  
 6 A Not as undergraduate or graduate assistant.  
 7 Q How about any other people who assisted you  
 8 in any way?  
 9 A You usually had to do the research  
 10 yourself. James Nelson.  
 11 Q And what was his position or how did he  
 12 help you?  
 13 A Graduate student.  
 14 Q Anybody else?  
 15 A No.  
 16 Q During the time that you were working at  
 17 USC Los Angeles in the Gerontology Building, do you  
 18 believe you were exposed to asbestos?  
 19 A Yes.  
 20 Q In what ways do you believe you were  
 21 exposed to asbestos there?  
 22 A Through Bunsen burner pads and heat  
 23 insulating mittens.  
 24 Q Were there Bunsen burners present in each  
 25 of the four rooms that you were conducting your

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1 Christian Holinka 139  
 2 research in?  
 3 A Yes.  
 4 Q How many were in each room?  
 5 A An estimated two to five.  
 6 Q Did the room that you worked out of have  
 7 any other numerical designation or name that you can  
 8 recall?  
 9 A Room numbers I do not recall.  
 10 Q Not named in honor of somebody or  
 11 so-and-so's lab or anything like that?  
 12 A I believe one or two were.  
 13 Q As you sit here today, do you know who they  
 14 may have been referring to?  
 15 A No.  
 16 Q Were there similar labs on the same floor  
 17 of that building?  
 18 A Yes.  
 19 Q Did you have a responsibility as a  
 20 post-doctoral fellow for ordering any of the Bunsen  
 21 burner pads that you used there?  
 22 A No, I did not.  
 23 Q Did you have a responsibility for ordering  
 24 any of the heat mittens that you used there?  
 25 A No.

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1 Christian Holinka 140  
 2 Q Did the Bunsen burner pads that you used  
 3 there appear similar in their shape and color when  
 4 compared to the ones you had encountered earlier in  
 5 your career?  
 6 A Yes.  
 7 Q Was there anything physically different  
 8 about them that you can recall at this time as opposed  
 9 to the others?  
 10 A No.  
 11 Q Do you know the brand, trade or  
 12 manufacturer's name of those Bunsen burner pads?  
 13 A No.  
 14 Q Do you know who specifically supplied those  
 15 pads that you used as a post-doctoral fellow at the  
 16 Gerontology Building?  
 17 A We had standard suppliers, I do not know  
 18 which individual standard supplier supplied them.  
 19 Q Did you need to get replacement pads on  
 20 occasion during those three years you were doing  
 21 research?  
 22 A Yes.  
 23 Q Where would you get them from?  
 24 A From the laboratory supply cabinet.  
 25 Q Which would have been located where?

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1 Christian Holinka 141  
 2 A At the laboratory in one of the four rooms.  
 3 Q Did you personally obtain new pads on  
 4 occasion during the three years that you were doing  
 5 research?  
 6 A Yes, I did.  
 7 Q And you would go to the storage area and  
 8 take them yourself?  
 9 A Yes.  
 10 Q When you would take them out, did they come  
 11 in any sort of packaging?  
 12 A No.  
 13 Q They were loose?  
 14 A Not to my recollection, no.  
 15 Q Your recollection is they were loose?  
 16 A Yes.  
 17 Q Stacked on top of each other or lined up  
 18 side by side?  
 19 A I believe stacked on top of each other.  
 20 Q Did you ever see any paperwork indicating  
 21 who specifically supplied those pads that you used  
 22 there?  
 23 A I did not.  
 24 Q Do you recall a replacement stock of these  
 25 pads coming in and being placed in that storage area?

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1 Christian Holinka 142  
 2 A Not specifically, no.  
 3 Q Did you ever encounter a situation there  
 4 where you had run out of pads and had to arrange to  
 5 have more pads brought over?  
 6 A No.  
 7 Q Did you use one set of mittens during the  
 8 three years there or more than one set?  
 9 A Set, you mean --  
 10 Q Pair.  
 11 A -- individual --  
 12 Q Pair I guess is the best way to put it.  
 13 A Many more than one. May I add something?  
 14 Q Yes, absolutely.  
 15 A To an extended response to your question  
 16 about collaborators.  
 17 Q Yes.  
 18 A The chief technician helped the laboratory.  
 19 Q Who was that?  
 20 A Heinz; H-E-I-N-Z, Osterburg;  
 21 O-S-T-E-R-B-U-R-G.  
 22 Q Did Mr. Osterburg have the responsibility  
 23 for ordering any replacement supplies?  
 24 A Yes.  
 25 Q Did you ever have a conversation with

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1 Christian Holinka 143  
 2 Mr. Osterburg advising that the lab or labs needed  
 3 more pads or mittens?  
 4 A No.  
 5 Q If you needed a replacement pair of  
 6 mittens, would you get them from the same supply area  
 7 located in one of those labs?  
 8 A Yes.  
 9 Q Do you recall how the replacement mittens  
 10 were stored in this area?  
 11 A No.  
 12 Q Was there anything different about the  
 13 physical appearance of these mittens as opposed to  
 14 mittens that you had encountered earlier in your  
 15 career?  
 16 A No.  
 17 Q Can you tell me any other specific type of  
 18 materials that you believe contained asbestos that you  
 19 handled there?  
 20 A No, I cannot tell you.  
 21 MR. DARCHE: Just one second.  
 22 (Discussion held off the record)  
 23 Q Did Mr. Heckland and Mr. Nelson and  
 24 Mr. Osterburg also use these types of materials in the  
 25 course of supporting you in your research?

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1 Christian Holinka 144  
 2 A Yes.  
 3 Q When was the last time you were in touch  
 4 with Mr. Heckland?  
 5 A About three months ago, four months ago.  
 6 Q Is Mr. Heckland aware of your current  
 7 physical situation?  
 8 A Yes.  
 9 Q Did you have any discussions with  
 10 Mr. Heckland about the types of products that you used  
 11 together while you were at USC Los Angeles?  
 12 A No.  
 13 Q Did you have any discussion with respect to  
 14 any products that may have contained asbestos?  
 15 A No.  
 16 Q Where does he currently live?  
 17 A In Baltimore.  
 18 Q When was the last time you spoke to  
 19 Mr. Nelson?  
 20 A An estimated three years ago.  
 21 Q Did you ever have any discussions with  
 22 Mr. Nelson about any asbestos-containing components  
 23 that were in any of the labs where you were?  
 24 A No.  
 25 Q And Mr. Osterburg, is he still alive?

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1 Christian Holinka 145  
 2 A Yes.  
 3 Q Where is he currently?  
 4 A In Los Angeles.  
 5 Q When was the last time you spoke with him?  
 6 MR. DARCHE: Three years ago.  
 7 A About half a year ago.  
 8 MR. SCHAFFER: We talked about Mr. Nelson  
 9 before.  
 10 MR. DARCHE: Sorry about that.  
 11 MR. SCHAFFER: We are talking about  
 12 Osterburg.  
 13 MR. DARCHE: Sorry about that.  
 14 Q Is Mr. Osterburg aware of your physical  
 15 condition?  
 16 A Yes, I told him.  
 17 Q Did you and he have any discussions whether  
 18 there were any materials or products in the labs that  
 19 may have exposed you to asbestos?  
 20 A We did not talk about it.  
 21 Q Is there anyone that you have talked about  
 22 with respect to your time at USC LA?  
 23 A USC, please.  
 24 Q I'm sorry, forgive me.  
 25 A Two different universities.

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1 Christian Holinka 146  
 2 Q My apologies.  
 3 Have you ever discussed the brand, trade or  
 4 manufacturer's names of any of the materials that you  
 5 believe contained asbestos that you encountered at USC  
 6 besides with representatives from your law firm?  
 7 A No.  
 8 MR. DARCHE: Off the record.  
 9 (Discussion held off the record)  
 10 Q Sir, I forgot to ask you, where does  
 11 Mr. Nelson currently live?  
 12 A San Antonio, Texas.  
 13 Q Separate and apart from your research that  
 14 you did at USC, do you believe that you were exposed  
 15 to asbestos when you were doing the teaching aspect of  
 16 your post-doctoral fellow work out there?  
 17 A I do not know but I do not think so.  
 18 Q And did that work result in any additional  
 19 degrees of any type as a post-doctoral fellow?  
 20 A No.  
 21 Q When in 1977 did you leave USC LA?  
 22 A In July.  
 23 MR. DARCHE: How are you feeling?  
 24 THE WITNESS: Okay.  
 25 MR. SCHAFFER: Let's go off the record a

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1 Christian Holinka 147  
 2 second.  
 3 (Discussion held off the record)  
 4 (Whereupon, at 12:20 P.M., a lunch recess  
 5 was taken)  
 6 (Back on the record at 1:25 P.M.)  
 7 Q Sir, we are back on the record and I just  
 8 want to go back over one or two things before we move  
 9 forward to your time at Mount Sinai if I may.  
 10 A Yes.  
 11 Q And I am not sure if I have asked you this  
 12 question before or if my colleague did or did not, so  
 13 if I did I apologize.  
 14 With respect to the mittens that you used  
 15 when you were at the lab at USC Los Angeles, do you  
 16 know who specifically manufactured them?  
 17 A No, I do not.  
 18 Q Do you know who specifically supplied those  
 19 mittens that you used at that location?  
 20 A No, I do not.  
 21 Q Let's move forward, your next job was  
 22 where?  
 23 A May I make a small addition to a previous  
 24 statement?  
 25 Q Yes.

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1 Christian Holinka 148  
 2 A Regarding the diameter of the asbestos  
 3 inset to the Bunsen burner covers, the diameter  
 4 probably was closer to 8 inches. I said 3 or 4, I  
 5 believe, I thought in the metric system and it was  
 6 closer to 8 inches.  
 7 Q And let me then ask you this: If the  
 8 diameter of the pad was 8 inches, what was the length  
 9 across of the meshing itself when you counted all the  
 10 meshing?  
 11 A An estimated 1 more inch on each side, so  
 12 it would be about 10 inches.  
 13 Q And were those mesh pieces typically square  
 14 or rectangular?  
 15 A Typically square.  
 16 Q After the lunch break looking back, is  
 17 there anything else that you need to amplify or  
 18 correct from this morning's testimony?  
 19 A No, there isn't.  
 20 Q Why did you leave the fellow position at  
 21 USC?  
 22 A I had a job offer at Mount Sinai School of  
 23 Medicine in New York City.  
 24 Q How did you come to get that offer?  
 25 A At a scientific meeting.

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1 Christian Holinka 149  
 2 Q And when did you start at Mount Sinai?  
 3 A August 1977.  
 4 Q And how long did you work there?  
 5 A Until July 1989.  
 6 Q And what was your position there?  
 7 A Initially an instructor and then assistant  
 8 professor in obstetrics, gynecology and reproductive  
 9 science.  
 10 Q How long would you have been an instructor  
 11 first there at Mount Sinai approximately?  
 12 A Approximately two to three years.  
 13 Q And the balance of the time that you were  
 14 there approximately nine or ten years was as an  
 15 assistant professor?  
 16 A Yes.  
 17 Q As an instructor there what were your hours  
 18 typically, if there was such a thing?  
 19 A Forty to sixty hours.  
 20 Q And would you teach classes both day and  
 21 night as needed?  
 22 A I did not regularly teach classes at Sinai  
 23 except one or two years a part of a course in  
 24 reproductive biology to medical students.  
 25 Q I'm sorry, I misinterpreted what you meant

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1 Christian Holinka 150  
 2 by instructor then. Can you tell me what your duties  
 3 were as an instructor?  
 4 A Research, the principal duties were  
 5 research.  
 6 Q When did you conduct the research as an  
 7 instructor there?  
 8 A During the period 1977 to '89.  
 9 Q When you were an instructor, yes.  
 10 A When I was an instructor and thereafter  
 11 when I was an assistant professor.  
 12 Q Where physically within the premises of  
 13 Mount Sinai did you do the research work as an  
 14 instructor?  
 15 A The Annenberg Building, 20th floor.  
 16 Q And was there a separate portion of the  
 17 floor such as a lab or other area within the 20th  
 18 floor that you worked at?  
 19 A Yes. There were several laboratories on  
 20 the floor.  
 21 Q Did you work in one of them or all of them?  
 22 A Principally in two different rooms.  
 23 Q And did these rooms have any numerical or  
 24 other designation?  
 25 A Yes.

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1 Christian Holinka 151  
 2 Q What were they called, if you remember?  
 3 A I don't remember.  
 4 Q And did you work in both of these rooms  
 5 during the time that you held the position of  
 6 instructor?  
 7 A Yes.  
 8 Q Do you believe that you were exposed to  
 9 asbestos at Mount Sinai in the course of your work as  
 10 an instructor those first two or three years?  
 11 A Yes.  
 12 Q And how during that time period do you  
 13 believe you were exposed to asbestos?  
 14 A By asbestos pads, Bunsen burner pads and  
 15 mittens.  
 16 Q Did you work yourself with the pads as an  
 17 instructor?  
 18 A Yes.  
 19 Q And what would you do with them?  
 20 A Well, you use them all the time for heating  
 21 the agents, heating water, heating media. It was the  
 22 only heat source at the laboratory.  
 23 Q Did you have on occasion the need to  
 24 replace the pads that you were using when you were an  
 25 instructor?

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1 Christian Holinka 152  
 2 A Yes.  
 3 Q Over the two or three years, can you  
 4 estimate how many times you would have replaced the  
 5 pads?  
 6 A About once every two months.  
 7 Q You said that there were two rooms, did  
 8 both of these rooms have Bunsen burners?  
 9 A Yes.  
 10 Q Can you tell me how many were in each room?  
 11 A Correction, three rooms.  
 12 Q Fair enough.  
 13 A When we did histology work I used a  
 14 different room.  
 15 The answer to your question, between two  
 16 and five.  
 17 Q Were there more Bunsen burners in the  
 18 histology room or not, if you know?  
 19 A About the same.  
 20 Q Now, was there anything different about the  
 21 physical appearance of these Bunsen burner pads that  
 22 you used there as opposed to those that you had  
 23 encountered prior in your career?  
 24 A No.  
 25 Q Did these pads have any words or logos or

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1 Christian Holinka 153  
 2 printing or anything on them that would identify their  
 3 manufacturer?  
 4 A They did not.  
 5 Q Or their supplier.  
 6 A They did not.  
 7 Q As an instructor did you have the  
 8 responsibility for ordering any pads that were used at  
 9 Mount Sinai?  
 10 A No.  
 11 Q If you needed to pick up a replacement pad  
 12 at Mount Sinai, where would you go?  
 13 A There was a central room for supplies for  
 14 the laboratory.  
 15 Q Was that also located on the 20th floor?  
 16 A Yes. It was really a large set of cabinets  
 17 in one of the laboratories.  
 18 Q Was it located in one of the three rooms  
 19 that you were in as an instructor?  
 20 A In one, yes.  
 21 Q If I asked you which one could you tell me?  
 22 A I believe a storage unit.  
 23 Q Do you know which particular room it was in  
 24 or you believe it was in one of them?  
 25 A I think it was in one.